

D & R APPRAISAL
Serving All Counties in Central New Jersey

Chairman Bernanke --

A letter was recently sent to your office by TAVMA, the Appraisal Vendor Management Assoc. The gist of the letter was to delay the implementation of portions of the Dodd-Frank Bill as it pertains to the Appraisal Profession.

As a New Jersey State Certified General Appraiser, and a long time member of the FHA Roster, I can assure you that the notions in their letter are misleading, at best.....and quite possibly outright falsehoods.

When the Executive Director of a Trade Group representing the AMC implores you to delay the end to their ability to **skim the fees** of Appraisers (who actually perform the Valuation Services), you can be certain what motivates them.

The TAVMA letter contains phrases like.....

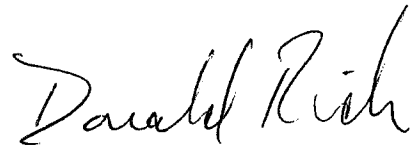
“At present it is unclear whether the ‘customary and reasonable’ provision should be adopted in the 90-day interim final regulations. TAVMA believes that the effective date should be delayed under Title XIV Section 1400(c)(3) until after a formal rule-making process.” That is both convoluted and self-serving.

By clinging to the status quo, TAVMA is hoping to perpetuate their takeover of my profession. The profession which requires that I take Continuing Education courses yearly, and that I adhere to Professional Appraisal Practices (USPAP).

Customary Appraisal Fees are defined in several places. The **VA Fee Schedule** for each state is available as a starting point. There are independent studies that I’m sure you’re aware of, compiled by unbiased parties. A survey of HUD-1 statements showing the recent history of rising Appraisal Charges at the hands of AMC’s should be of interest to your team.

A new approach which would provide better Consumer Protection would be to separate the fees on the HUD-1 statement. The Consumer would see exactly what they're being charged, in the most important purchase of their lives. Reasonable Fees to the Appraiser for Valuation Services, and a Management Fee for the AMC. The AMC "service" is actually provided to the Lender, and the Appraiser should not be paying for it with reduced fees.

Please continue your team's efforts to ensure that Professional Appraisers are compensated at a "Customary & Reasonable" Rate.

A handwritten signature in cursive script that reads "Donald Rich".

Donald Rich

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